

UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE:	: CHAPTER 13
MARTIN D. BORST,	:
AKA MARTIN BORST,	:
Debtor	:
	:
JACK N. ZAHAROPOULOS,	:
STANDING CHAPTER 13 TRUSTEE,	:
Movant	:
	:
vs.	:
	:
MARTIN D. BORST,	:
AKA MARTIN BORST,	:
Respondent	: CASE NO. 5:25-bk-00376-MJC

**TRUSTEE'S OBJECTION TO FIRST AMENDED CHAPTER 13 PLAN**

AND NOW, this 28<sup>th</sup> day of May 2025, comes Jack N. Zaharopoulos, Standing Chapter 13 Trustee, by and through his attorney Agatha R. McHale, Esquire, and objects to the confirmation of the above-referenced Debtor's Plan for the following reasons:

1. Trustee avers that Debtor's Plan is not feasible based upon the following:
  - a. Insufficient Monthly Net Income as indicated on Schedules I and J.
2. Trustee avers that Debtor's Plan cannot be administered due to the lack of the following:
  - a. Debtor has not provided to Trustee the Proof of Claim for Select Portfolio.
3. Trustee provides notice to the Court as to the ineffectiveness of Debtor's Chapter 13 Plan for the following reason:
  - a. Part 2.A. of the Plan indicates conduit payments, but Part 2.D. says "None."

WHEREFORE, Trustee alleges and avers that Debtor's Plan cannot be confirmed, and therefore, Trustee prays that this Honorable Court will:

- a. deny confirmation of Debtor's Plan;
- b. dismiss or convert Debtor's case; and
- c. provide such other relief as is equitable and just.

Respectfully submitted:

Jack N. Zaharopoulos  
Standing Chapter 13 Trustee  
8125 Adams Drive, Suite A  
Hummelstown, PA 17036  
(717) 566-6097

BY: /s/ Agatha R. McHale, Esquire  
Attorney for Trustee

CERTIFICATE OF SERVICE

AND NOW, this 28<sup>th</sup> day of May 2025, I hereby certify that I have served the within Objection by electronically notifying all parties or by depositing a true and correct copy of the same in the United States Mail at Hummelstown, Pennsylvania, postage prepaid, first-class mail, addressed to the following:

Amy L. Ginsburg, Esquire  
Ginsburg Law Group, P.C.  
653 Skippack Pike  
Suite 300-71  
Blue Bell, PA 19422

/s/ Derek M. Strouphauer, Paralegal

Office of Jack N. Zaharopoulos  
Standing Chapter 13 Trustee